

PSJ9 Exh 16

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 IN RE NATIONAL PRESCRIPTION | MDL No. 2804
5 |
6 OPIATE LITIGATION | Case No. 17-MD-2804
7 |
8 This Document Relates to: | Hon. Dan A. Polster
9 |
10 The County of Summit, Ohio, |
11 et al., v. |
12 Purdue Pharma L.P., et al. |
13 Case No. 17-op-45004 |
14 |
15 The County of Cuyahoga v. |
16 Purdue Pharma L.P., et al. |
17 Case No. 18-op-45090 |
18 |
19 City of Cleveland, Ohio v. |
20 Purdue Pharma L.P., et al. |
21 Case No. 18-op-45132 |

22 - - -
23 Friday, December 7, 2018
24 - - -

25 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
26 CONFIDENTIALITY REVIEW
27 - - -

28 Videotaped deposition of WILLIAM VERSOSKY,
29 held at Foley & Lardner LLP, One Biscayne Tower,
30 2 Biscayne Boulevard, Suite 1900, Miami, Florida,
31 commencing at 9:25 a.m., on the above date,
32 before Susan D. Wasilewski, Registered
33 Professional Reporter, Certified Realtime
34 Reporter and Certified Realtime Captioner.
35 - - -

36 GOLKOW LITIGATION SERVICES
37 877.370.3377 ph | 917.591.5672 fax
38 deps@golkow.com

1 Q. That's something that you -- you actually
2 had a hand in developing, right?

3 A. Yes.

4 Q. And you developed this system, I think
5 around the time you had -- you had Walgreens come to
6 you to seek getting opioids from you, right?

7 A. Yeah, they were seeking to get controls from
8 us, yes.

9 Q. And they were seeking to get controls from
10 you because they had had an entire distribution
11 center in Jupiter, Florida, shut down, right?

12 A. I believe it --

13 MS. KOSKI: Object to form.

14 A. Yeah. I believe it was their -- I thought
15 it was their wholesaler had a distribution center
16 shut down.

17 Q. There was a distribution -- there was one or
18 two distribution centers shut down and they could no
19 longer get opioids from those places, right?

20 A. Correct.

21 Q. And so they could however -- the problem
22 apparently, was with the sent -- the distribution of
23 the drugs, but they were still allowed -- their
24 stores were still allowed to buy the drugs, they
25 just needed to find somewhere else to buy them,

1 right?

2 A. Correct.

3 Q. So at that time, you had a hand in
4 developing this system and I'd like to go over that
5 quickly. I think this is it here.

6 MR. PENNOCK: Ben, yeah, this is it.

7 (Anda-Versosky Exhibit 21 was marked for
8 identification.)

9 BY MR. PENNOCK:

10 Q. Mr. Versosky, you -- we've marked as
11 Exhibit 21 to your deposition an e-mail thread. It
12 begins with Bates number 0000725880 and the last
13 document is 883.

14 Okay? You've had a chance to look at that?

15 A. Yes.

16 Q. And this is an e-mail from you to the
17 president of the company, Albert Paonessa, right?

18 A. Yes.

19 Q. This is from November 2012, right?

20 A. Yes.

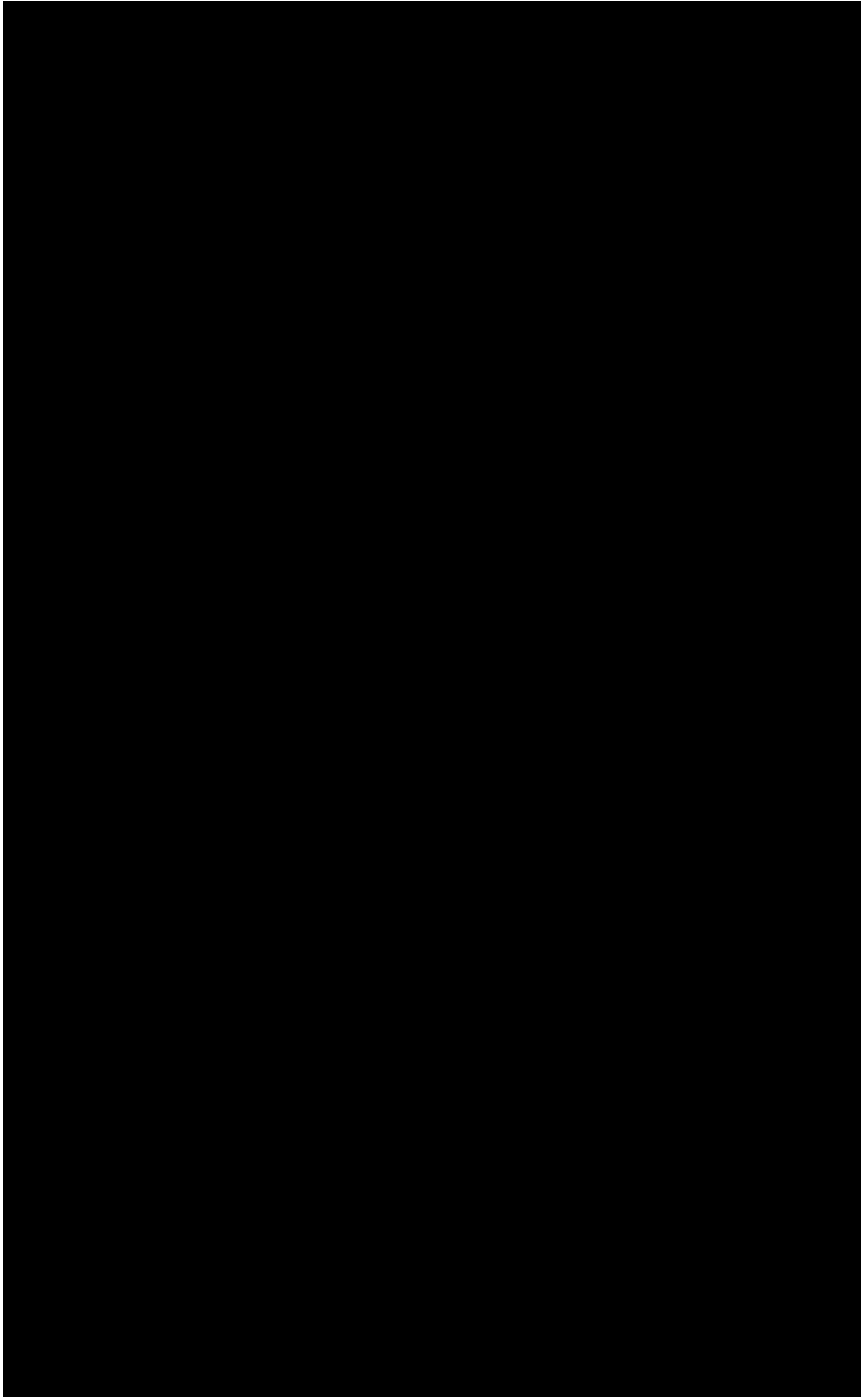
21 Q. And it's titled -- you were forwarding it,
22 it's, Controlled Substances Query Questions, right?

23 A. Yes.

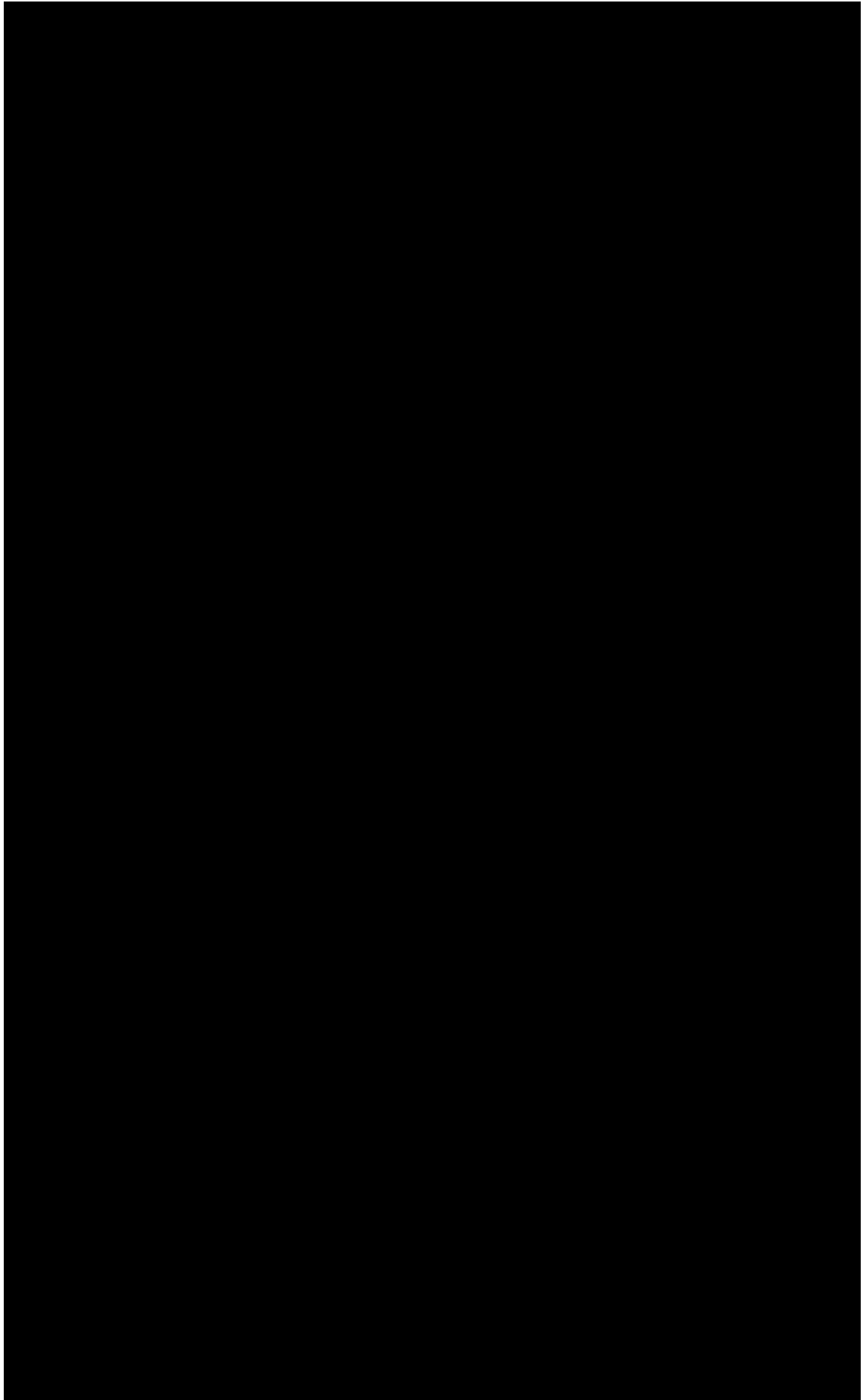
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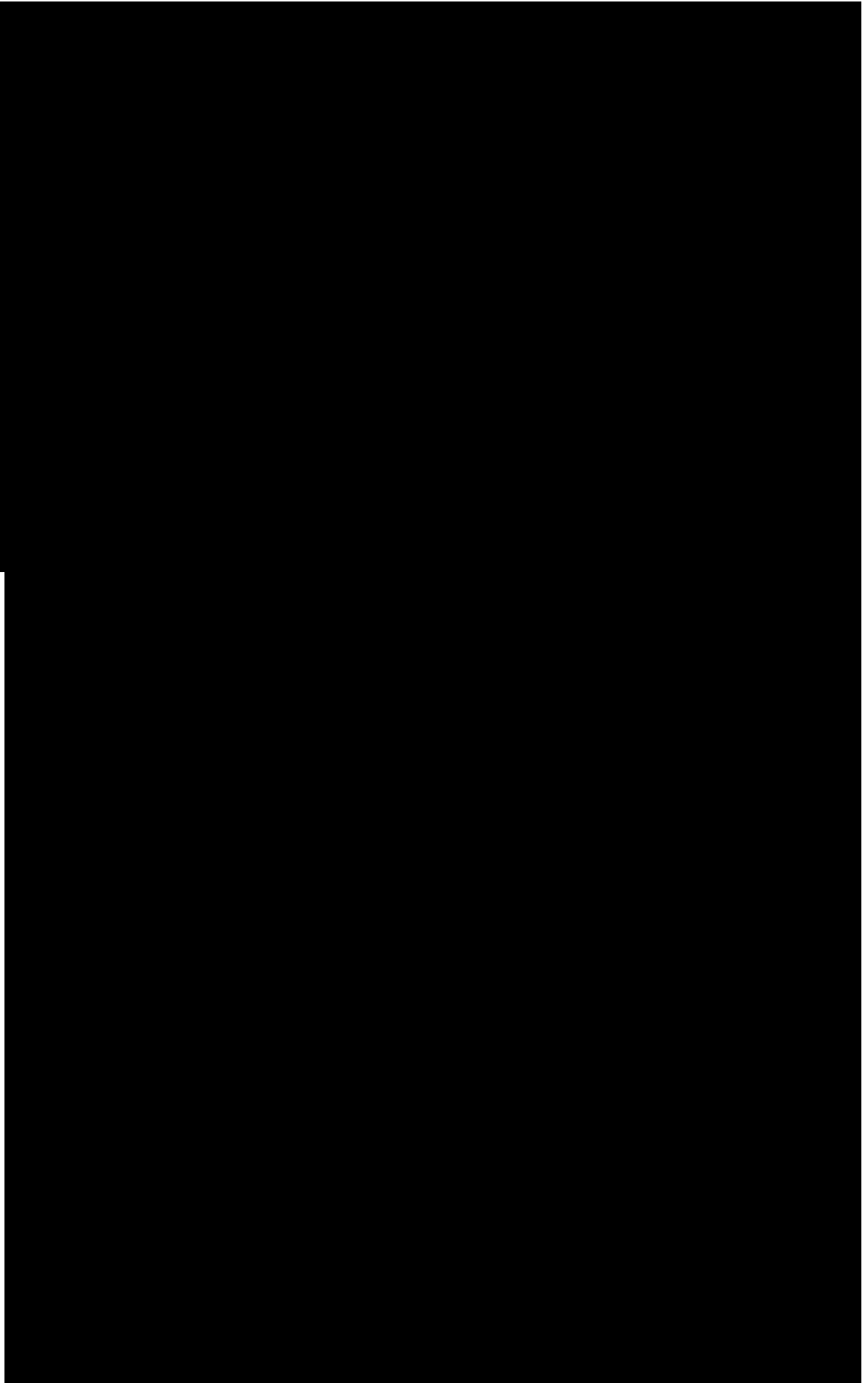
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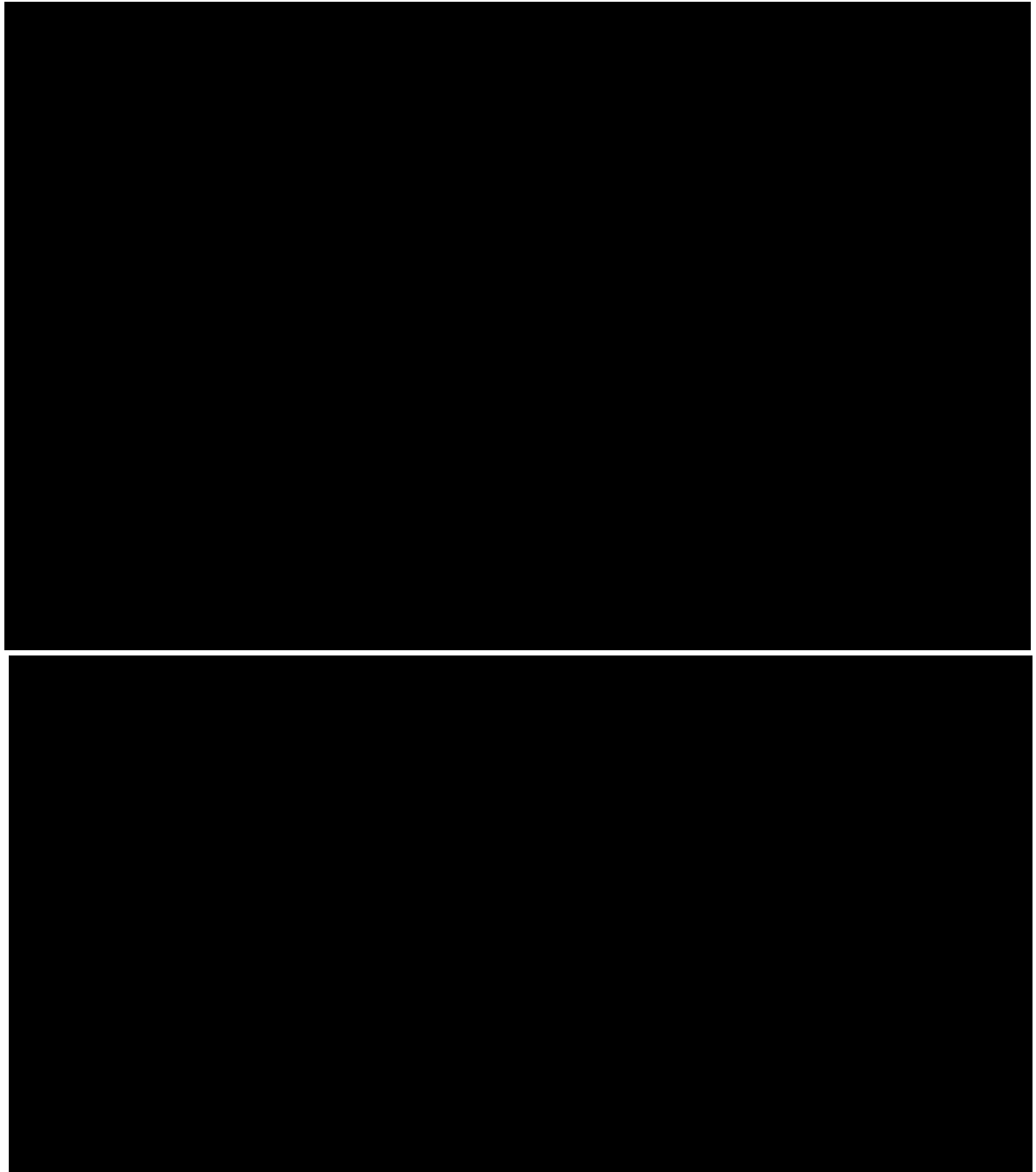
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Q. And -- okay. I'll mark this?

(Anda-Versosky Exhibit 22 was marked for
identification.)

BY MR. PENNOCK:

Q. So Walgreens had, like, what, 8,000 stores,
something like that?

A. Yes.

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24 Q. And if we go back a page, and this is all
25 laid out by states, true?

1 A. Yes.

2 Q. And if we look at Ohio, in Ohio there were
3 255 stores, right?

4 A. Yes.

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14 Q. Okay. Now, so when you -- after you ran
15 this, did you provide this information to Walgreens?

16 A. I believe we did, yes.

17 Q. And when you provided it to them, did
18 they -- at any point thereafter, did Walgreens tell
19 you, well, I think we're going to be shutting down
20 some controlled substances sales at some of our
21 stores in Ohio?

22 MS. KOSKI: Object to form.

23 A. I don't recall that ever happening.

24 Q. And let's just look at some of the Ohio
25 stores.